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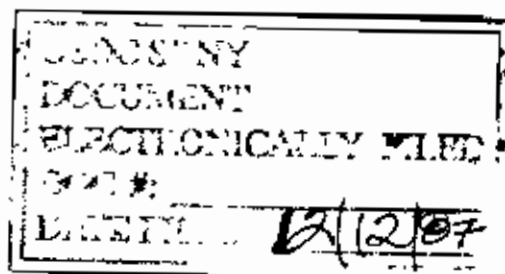
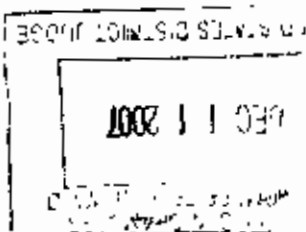
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December 11, 2007

Via Facsimile

Honorable Naomi R. Buchwald
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007



Re: Gould Paper Corp. v John R. Curtin and Salvatore Capalbo
Civil Docket No. 07-9524 (NRB)

Dear Judge Buchwald:

On December 3, 2007, we submitted a letter requesting a pre-motion conference with regard to a motion to dismiss we intend to file as to our client John R. Curtin. Plaintiff Gould Paper Corp. responded to that letter yesterday. I write to advise the Court that the parties have made substantial progress toward a potential resolution, and for this reason, Mr. Curtin requests, with the consent of Gould Paper, that the pre-motion conference be scheduled for a date in mid-January with Mr. Curtin's motion due two weeks thereafter.

In addition, while our firm does not represent Mr. Capalbo, our current settlement discussions contemplate resolution of the claims against him as well. Mr. Capalbo has not yet retained counsel. If the litigation moves forward, he will be retaining separate counsel. At this point, therefore, we request, on his behalf and with his approval, that Mr.

MEMO ENDORSED Endorsement

*The parties shall report to The Court
on the progress of their discussions by
January 14, 2008.*

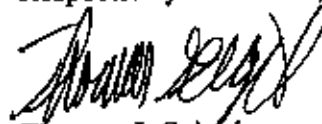
So Ordered.

Kevin P. Deane, Esq., USDC

December 11, 2007

Capalbo's deadline to move or answer the Complaint be extended to the same date in January 2008 as the pre-motion conference. Gould Paper also consents to this request.

Respectfully submitted,



Thomas J. Seigel

cc: James C. Riley, Esq.
Mr. Salvatore Capalbo